

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GREAT WESTERN INSURANCE COMPANY,

Plaintiff,

v.

MARK GRAHAM, *et al.*,

Defendants.

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Civil Action No.: 1:18-cv-06249-
VSB-SN

**DECLARATION OF JOHN L. OLSEN IN SUPPORT OF WILMINGTON SAVINGS
FUND SOCIETY, FSB AND CHRISTIANA TRUST’S MOTION TO DISMISS
PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(2) AND 12(b)(6)**

John L. Olsen, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. My name is John L. Olsen, and I am over 18 years of age, of sound mind, and otherwise competent to make this declaration (“Declaration”). The facts set forth in the instant Declaration are based on my personal knowledge and reasonable inquiry.

2. I am a Senior Vice President and General Counsel for Wilmington Savings Fund Society, FSB (“WSFS”). I have held this position for seven (7) years. In this position, I am knowledgeable about WSFS’s corporate structure and its operations, including where WSFS does business and where WSFS owns property.

3. I understand that the above-captioned matter involves a dispute relating to, among other things, a trust agreement between Great Western Insurance Company and WSFS (“Trust Agreement”). I make this Declaration in support of Wilmington Savings Fund Society, FSB and Christiana Trust’s Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6).

4. WSFS is a federally chartered savings association. Its home office is located in Wilmington, Delaware.

5. WSFS does not own, use, or possess any real property in New York.

6. WSFS does not have any branches, offices, or regular operations in New York.

7. WSFS did not perform any of its duties under the Trust Agreement in New York.

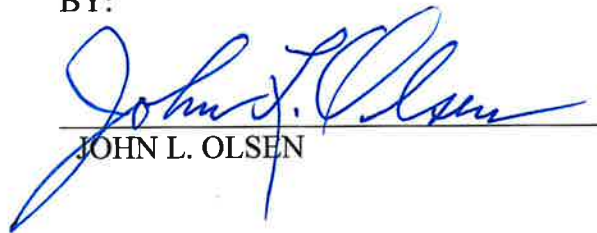
To the contrary, when performing duties set forth in the Trust Agreement, WSFS did so exclusively in Delaware.

8. In addition, Christiana Trust is a division of WSFS and not a separate entity.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2018.

BY:



JOHN L. OLSEN